

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

ARTHUR BEDROSIAN,)	
)	Case No. 2:15-cv-05853
Plaintiff,)	
)	
v.)	
)	
UNITED STATES OF AMERICA, et al.,)	
)	
Defendants.)	
)	

**UNITED STATES' OBJECTIONS TO THE PLAINTIFF'S SUPPLEMENTAL
DEPOSITION DESIGNATIONS AND EXHIBITS**

The United States objects to the plaintiff's supplemental designations of the deposition testimony of John West, Pamela Christensen, and Mike Enz, who are all employees of the Internal Revenue Service. Docket Nos. 51, 55.¹ The United States also objects to exhibits P-28, P-29, P-30, P-31, P-32, P-33, P-34, and P-35. The deposition testimony and documents are not relevant to this *de novo* proceeding. This Court entered an opinion and order granting the United States' motion in limine excluding evidence of the "procedures, actions, analyses, or viewpoints of the Internal Revenue Service and its personnel at the administrative level regarding willfulness." Docket No. 52; *see also* Docket No. 51.

Because all of the deposition testimony and documents that the plaintiff seeks to admit reflect the procedures, actions, and opinions of the Internal Revenue Service and its personnel, all of this proposed evidence is encompassed within the Court's order. Therefore, none of the evidence referenced above should be admitted.

¹ It is not clear if the plaintiff's second supplemental deposition designations (Docket No. 55) supercedes the first supplemental deposition designations (Docket No. 51).

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CERTIFICATE OF SERVICE

I certify that the foregoing *United States' Objections to the Plaintiff's Supplemental Deposition Designations and Exhibits* was filed on September 6, 2017 through the Court's CM/ECF filing system, which will automatically send a copy to the following:

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